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# 3 RIVERS COMMUNICATIONS

April 28, 2016

Federal Communications Commission  
445 12<sup>th</sup> St. S. W.  
Washington, D.C. 20554

**RE: ALTERNATIVE CONNECT AMERICA COST MODEL VERSION 2.2 AND ILLUSTRATIVE  
RESULTS AND CHALLENGE PROCESS TO COMPETITIVE COVERAGE  
DA 16-378 APRIL 7, 2016, WC Docket No. 10-90**

In the *Rate-of-Return Reform Order*, the Federal Communications Commission ("Commission" or "FCC") ordered the Wireline Competition Bureau ("Bureau") to incorporate into the Alternative Connect America Cost Model (A-CAM) the June 2015 FCC Form 477 data and concluded that commenters be allowed to challenge the competitive coverage contained in the updated version of the A-CAM. Commenters were given 21 days from the release of the updated version of the A-CAM to challenge the coverage data.

On April 7, 2016, the Bureau released a new version of the A-CAM, v2.2, which incorporated the inputs and modifications recently adopted by the Commission in the *Rate-of-Return Reform Order*.

Pursuant to this challenge process, 3 Rivers Telephone Cooperative, Inc. ("3 Rivers") is challenging the competitive coverage reflected in the A-CAM, v2.2, for the following reasons (see Exhibits A-F for specific census block details):

- 1) In most cases, the census blocks containing competitive coverage for 3 Rivers appear to span two independent ILEC study areas. Therefore, although there appears to be competition within the census blocks, the two independent ILECs do not compete with each other in these census blocks (and only provide service within their respective study areas). A-CAM support should not be eliminated for locations that are within these census blocks AND 3 Rivers' study area.
- 2) There are no competitors in certain census blocks that are entirely in 3 Rivers study area and A-CAM support should not be eliminated for locations in those census blocks.
- 3) There are fixed-wireless providers with limited coverage in portions of some census blocks. Because the fixed wireless service coverage is limited to higher elevation locations, very few of the overall locations can be served with broadband.

Additionally, in the A-CAM v2.2, there were 1,200 census blocks eliminated because they were determined to be served by 3 Rivers with fiber-to-the-premise ("FTTP") technology. Of these 1,200 census blocks, 900 of them were reported on the June 2015 FCC Form 477 filed by 3 Rivers. The remaining 300 census blocks were not reported as being served by 3 Rivers. This raises a concern of the accuracy of the census block data, and the overall A-CAM, as these 300 census blocks are reflected as served by 3Rivers FTTP, but 3 Rivers did not report them on the June 2015 FCC Form 477.

Although we understand that we are not able to challenge the classification of these 300 census blocks, 3 Rivers has serious concern about the validity of census block classifications and how those classifications might affect our decision to elect the A-CAM or to remain on the modified rate-of-return legacy funding.

3 Rivers respectfully requests that the competitive coverage for the census blocks referenced in Exhibit A be corrected such that the locations in those census blocks are eligible for A-CAM support.

Sincerely,

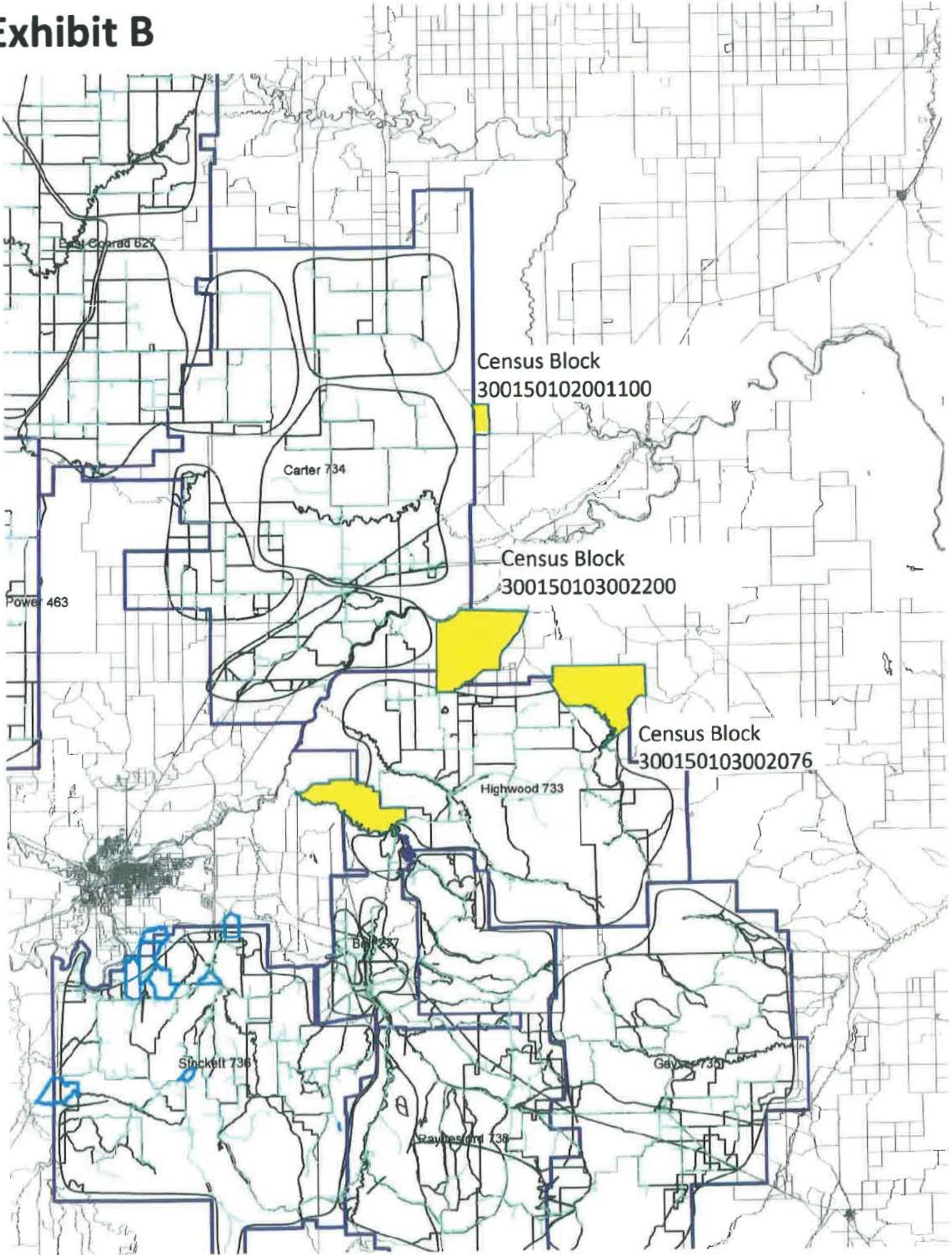
David H. Gibson  
CEO & General Manager  
3 Rivers Telephone Cooperative, Inc.

## EXHIBIT A

<u>Census Block</u>	<u>Competitor</u>	<u>Challenge detail</u>
300150102001100	Central Montana Communications, Inc.	This census block appears to span the study areas of both 3 Rivers and Central Montana Communications, Inc. Although both ILECs serve this census block, they do not cross the study area boundaries with their services and therefore are not competitors. See Exhibit B.
300150103002076	Central Montana Communications, Inc.	This census block appears to span the study areas of both 3 Rivers and Central Montana Communications, Inc. Although both ILECs serve this census block, they do not cross the study area boundaries with their services and therefore are not competitors. See Exhibit B.
300150103002200	Central Montana Communications, Inc.	This census block appears to span the study areas of both 3 Rivers and Central Montana Communications, Inc. Although both ILECs serve this census block, they do not cross the study area boundaries with their services and therefore are not competitors. See Exhibit B.
300590001002108	Central Montana Communications, Inc.	This census block appears to span the study areas of both 3 Rivers and Central Montana Communications, Inc. Although both ILECs serve this census block, they do not cross the study area boundaries with their services and therefore are not competitors. See Exhibit C.
300130101003097	CenturyLink, Inc.	This census block appears to span the study areas of both 3 Rivers and CenturyLink, Inc. Although both ILECs serve this census block, they do not cross the study area boundaries with their services and therefore are not competitors. See Exhibit D.
300359404001000	CenturyLink, Inc.	This census block is entirely within 3 Rivers' study area boundary and CenturyLink does not provide service to this census block. See Exhibit E.
300359404004062	CenturyLink, Inc.	This census block is entirely within 3 Rivers' study area boundary and CenturyLink does not provide service to this census block. See Exhibit E.1.
300359404004063	CenturyLink, Inc.	This census block appears to span the study areas of both 3 Rivers and CenturyLink, Inc. Although both ILECs serve this census block, they do not cross the study area boundaries with their services and therefore are not competitors. See Exhibit E.1.
300359404004074	CenturyLink, Inc.	This census block appears to span the study areas of both 3 Rivers and CenturyLink, Inc. Although both ILECs serve this census block, they do not cross the study area boundaries with their services and therefore are not competitors. See Exhibit E.1.
300130106001003	SpeedConnect LLC	Speed Connect LLC is a fixed wireless provider that has limited coverage in portions of these census blocks and because it is fixed wireless signal, only a few locations (typically at higher elevations) within these census blocks might be reached with broadband. See Exhibit F.
300150106001011	SpeedConnect LLC	
300130106001013	SpeedConnect LLC	
300150106001016	SpeedConnect LLC	
300130106003020	SpeedConnect LLC	
300150106003051	SpeedConnect LLC	
300130106004079	SpeedConnect LLC	
300150103002342	SpeedConnect LLC	

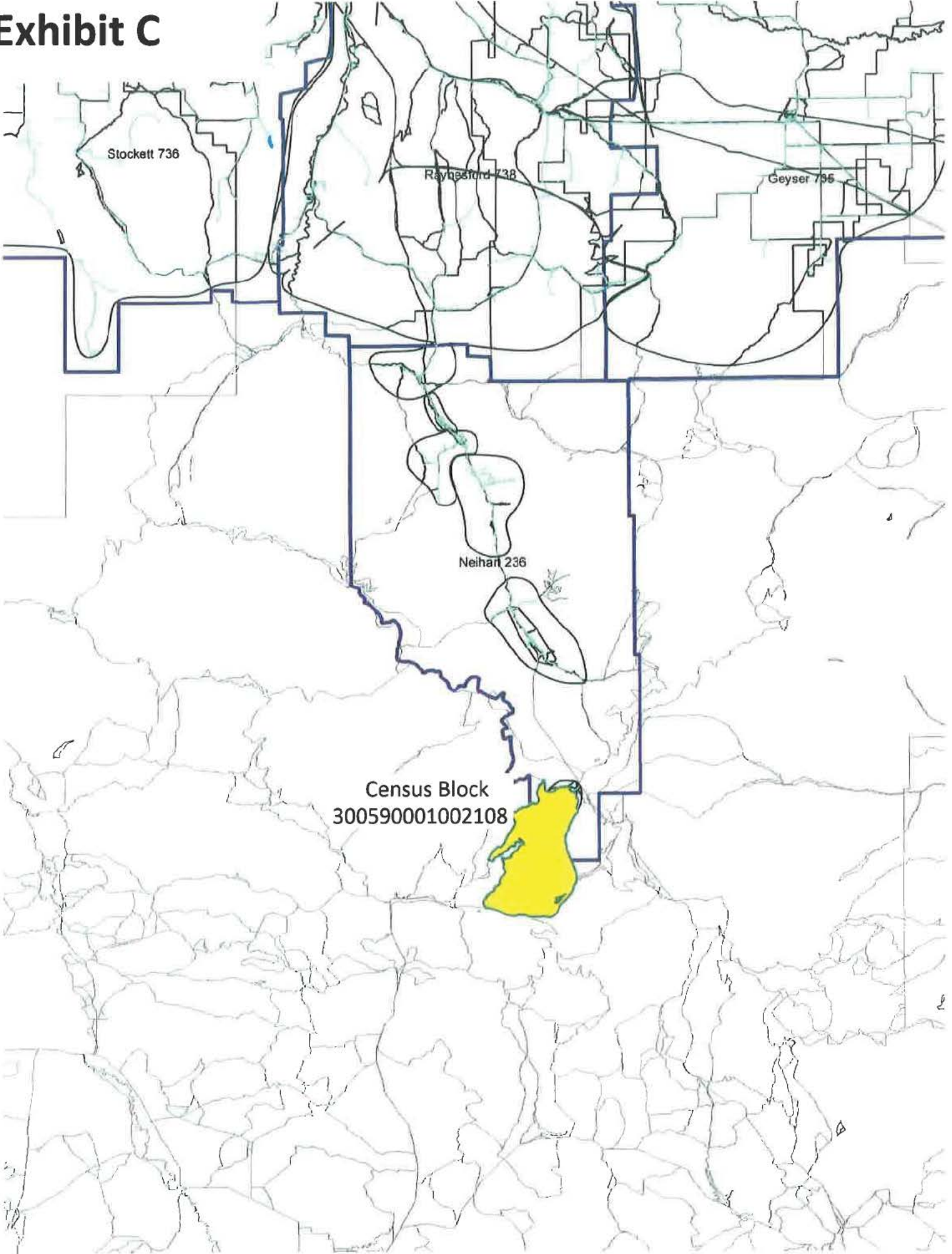


Exhibit B





**Exhibit C**



Stockett 736

Raynesford 738

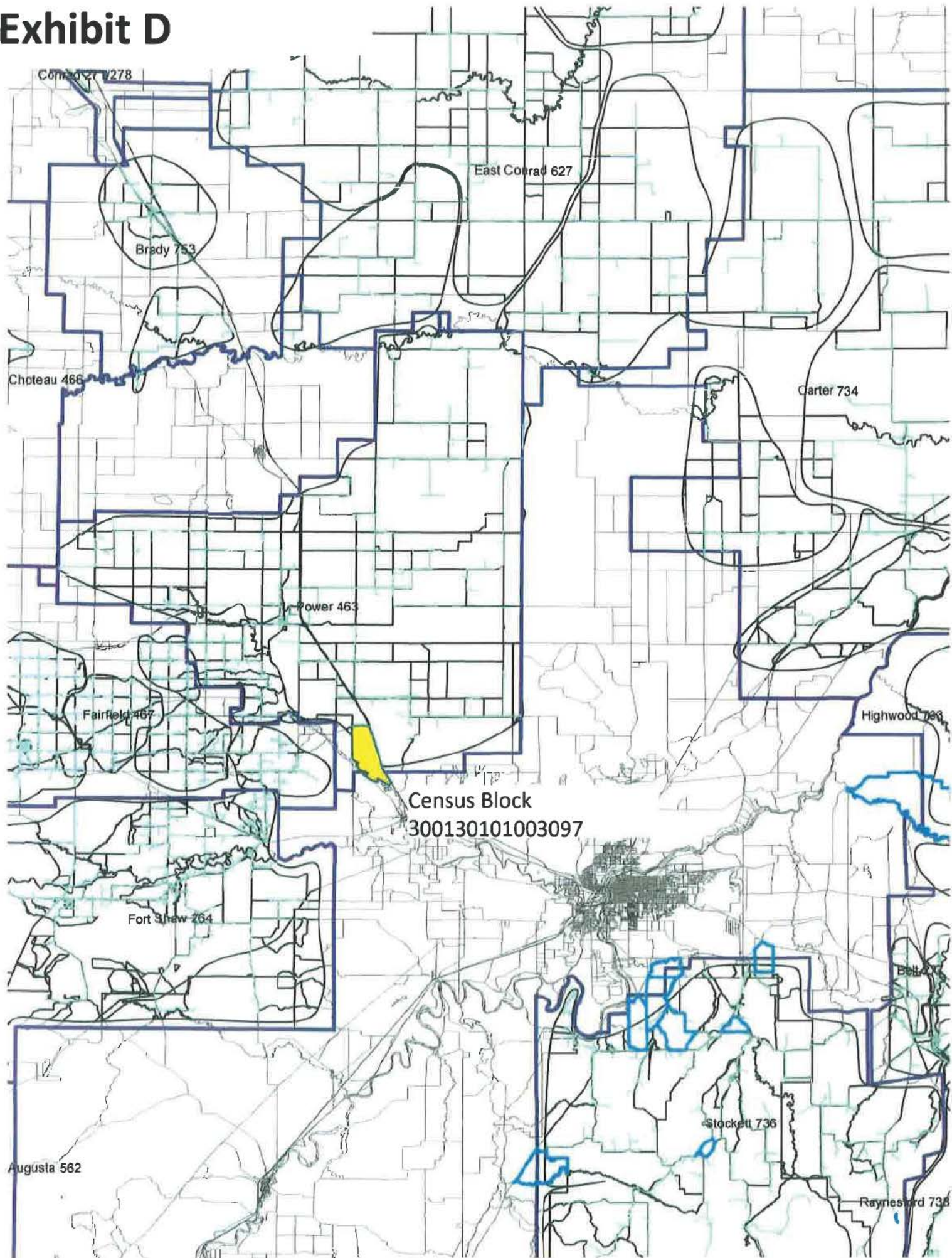
Geyser 735

Neihart 236

Census Block  
300590001002108



# Exhibit D

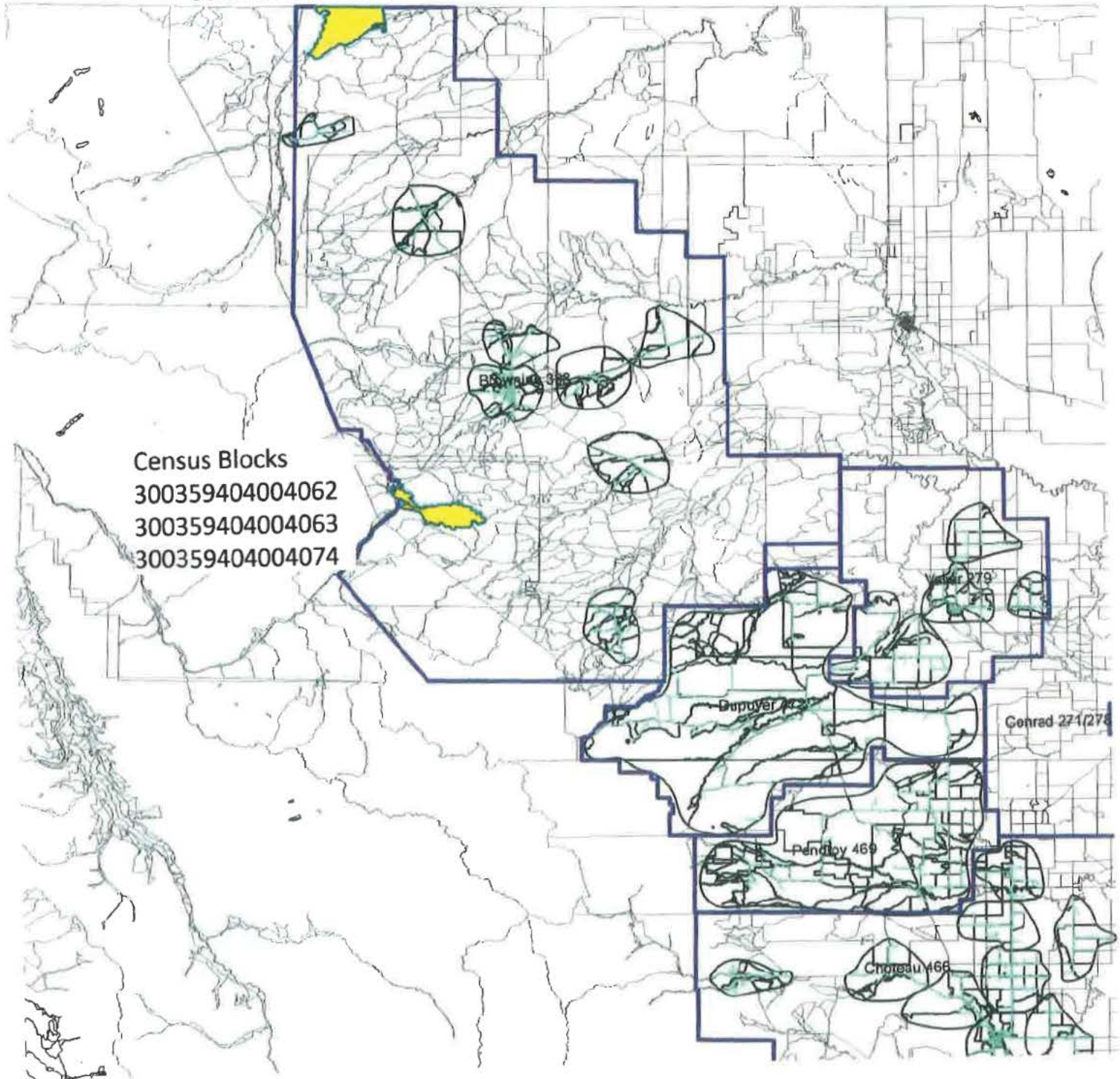




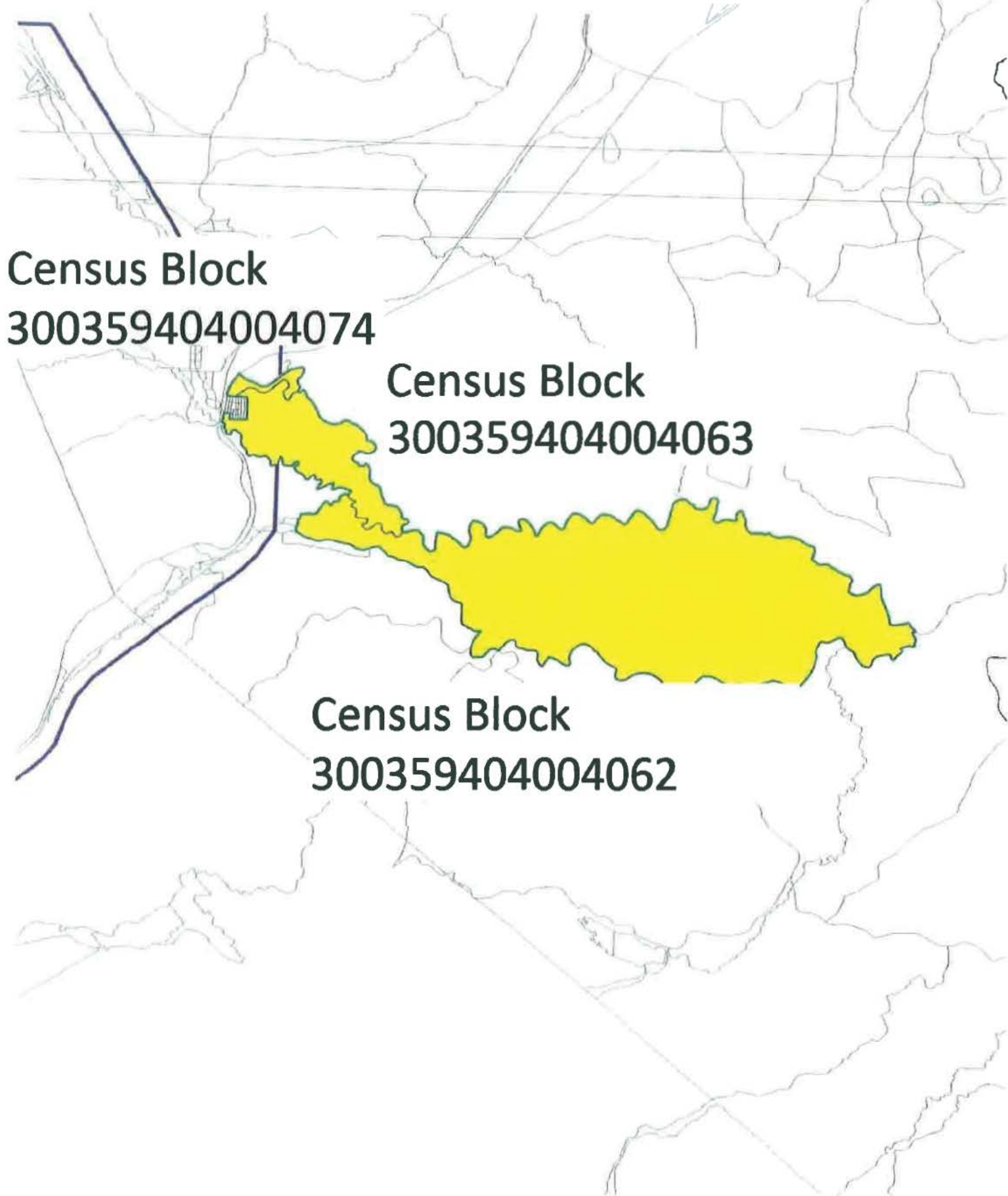
# Exhibit E

Census Block  
300359404001000

Census Blocks  
300359404004062  
300359404004063  
300359404004074



# Exhibit E.1



Census Block  
300359404004074

Census Block  
300359404004063

Census Block  
300359404004062



# Exhibit F

